

EG&G ROCKY FLATS

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SLUDGE CONSOLIDATION

EG&G presented a schedule for completing the sludge and water consolidation in the 207 B ponds. EG&G stated that there is less sludge in 207B-Center than we had originally thought. The amount of sludge can be expressed variously as about four inches, one third acre-foot, or about 100,000 gallons. While it took EG&G about four and a half months to empty about this same amount of sludge out of 207 A, we have learned from that effort and expect to cut the time required in half. We need to retain about four acre-feet of water, which corresponds to about 190 inches of "total freeboard" to achieve the intermediate consolidation into two 207 B ponds. The sludge consolidation refers to the 207 A/B unit only; 207 C Pond is not included.

There are about four and a half acre-feet of excess water in the ponds now, and removing this excess water is necessary before we can consolidate two ponds simultaneously. Building 374's capacity to receive and process water is the limiting factor in removing excess water.

We discussed the pumping to Building 374 of water from the ponds versus from the Modular Tanks. CDH reiterated that the IM/IRA amendment granted by the regulators was contingent on Rocky Flats placing priority on treating pond water. DOE explained that we pumped Modular Tank water partly due to a surge in inflow from the trench and partly due to startup problems with the tank pumps. CDH asked how DOE will decide when to pump pond water and when to pump Modular Tank water. DOE is using past history, which is poorly documented.

CDH emphasized that returning trench water must not be returned to the ponds. CDH would be interested in hearing more about the total water management of ponds and Modular Tanks. CDH requested that they be notified with a phone call of when DOE is treating pond water and when they are treating Modular Tank water.

Concern was raised that the plant may not have the capacity to keep the emptied pond dry. EPA requested information on how pond water treatment in Building 374 interacts with laundry water treatment. DOE personnel present offered to pass on the questions to DOE staff responsible for the laundry, and recommended the regulators talk with those individuals directly. Noreen Matsuura was identified as the appropriate DOE, RFO contact.

There was further discussion of the last time DOE had emptied 207 A Pond, and why water accumulated in that pond again. EG&G said part of the problem was Building 374 being down for maintenance for half of 1991. Building 374 runs continuously when it is up, and can process 1.3 million gallons in a run-month.

EPA requested status on the pad sealing job, which appears to them to be taking a long time for a simple job. DOE stated one delay was due to weather: the sealant cannot be applied at temperatures below 50 ° C.

EG&G raised the possibility of consolidating the clarifier into 207 C Pond, as a step towards eventual strip-out of that equipment. CDH reported they considered a similar proposal about a year ago, and Land Disposal restrictions prevent such a consolidation.

The group discussed possible actions with the pond sludges once consolidation is complete. Among the concepts discussed were relining B cells for 207 B and 207 C sludge storage, and creating cells in 207 A Pond for storage. CDH noted that 207 A/B cells and 207 C cell are if different RCRA units; this is a permitting issue that would need to be addressed.

EPA would like to see some of the raw remedial investigation data as it comes in. DOE suggested they may have enough data to include that in next month's meeting. EPA was concerned that may not be quickly enough, since that data may help avoid the cost of consolidating sludge in the 207 B Ponds if it leads us to decide to use 207 A Pond for storage. DOE was skeptical that we could decide on use of 207 A Pond soon enough to affect sludge consolidation. For example, DOE expects to prepare an Environmental Assessment in support of such a decision. EPA does not recognize DOE's need to prepare NEPA documents for the decision.

EG&G reported they are evaluating whether RCRA inspections of 207 A Pond can be suspended, since the pond is empty. They expect to be able to report on this further at the next meeting.

BUILDING 910 STATUS

EG&G presented a brief status report on the Building 910 start up. EG&G would prefer to use Interceptor Trench System water, which is available to Building 910 from the Modular Tanks, rather than pond water for the acceptance phase operation and subsequent production. EPA asked if EG&G anticipated problems with the pond water. EG&G would expect filters to blind faster with pond water than with Modular Tank water, and Building 910 can accept either feed, but tank water would be operationally easier. The regulators indicated the use of Modular Tank water would probably be acceptable. EG&G stated they would review pond levels and let the regulators know their recommendation for a feed source.

EG&G reported that many leaks had arisen in the Building 910 evaporators during operational testing on domestic water (called "cold testing" to reflect the use of non-radioactively contaminated water). The EPA representative stated he had visited the facility during a cold test and observed no leaks. EG&G stated the leaks were most common during temperature changes. EG&G plans to repair one unit by June 1 and put that unit through five thermal cycles to test the repair; and repair the other two units by June 12. the group discussed various repair techniques.

CDH asked if operation of Building 910 would impact sludge consolidation. EG&G expects no affect on sludge consolidation. CDH reiterated their interest in ensuring pond water treatment gets priority on site. DOE stated that the need for priority is known, but possible impacts could occur from the plant's mission change, potential lay-off, and the negotiation of the Steelworker's contract. CDH would like to see daily contact with Building 374 staff to keep emphasizing the priority.

EPA requested to view the pad sealing job when it is complete. DOE indicated they would arrange that upon job completion.

The group again discussed the interaction of laundry water with Building 374's ability to accept pond water. EPA asked if alternatives, such as throwing away laundry, had been investigated, and whether other streams to Building 374 could be suspended until the ponds were empty. DOE representatives said they would pass on the concern to the RFO staff responsible for the laundry.

WASTE PILE REQUEST

REVIEW OF ACTION ITEMS

Old:

- CDH completed the comments on OU 4 TMs from last month's list

Discussion followed on the Ecological Evaluation (EE) Technical Memorandum (TM). CDH is trying to get a letter to DOE quickly on what activities to start. The decision is firm, and CDH urged DOE to not miss the window for filed work. Scott Surovchak will talk to Rich Schassburger to figure out what DOE thinks they should be starting. The OU 4 Phase I RI does not need an EE chapter, so the OU 6 schedule will be followed.

- DOE issued the amendment letters to Reading Room copies of the IM/IRA.
- DOE submitted the Waste Pile designation request.

Discussion followed on the waste pile designation. CDH representatives have heard that the CDH permit-writers will reject the waste pile designation as inappropriate under Interim Status. There seems to be no problem with the waste pile concept, though the issue of free liquids has not been resolved. DOE requested that CDH look at the request technically, and provide technical comments as well as their rejection on the basis of Interim Status. DOE intends to proceed with a permit modification request if Interim Status is denied, and the technical package will be the same. CDH reminded DOE to include a closure plan with the permit modification request, and suggested the OU 10 Work Plan would be a good source for the closure plan. CDH recommended that further meetings on the waste pile designation be allowed to grow out of the permit modification process.

EPA stated they may not be able to support a permit for the pads if it provides open-ended operation of the pads. CDH stated the pads could be removed from OU 4 but retained in the IAG framework.

- CDH stated the extension response will be out tomorrow.

New:

- DOE will see if someone can speak to the group about the laundry (Scott Surovchak)
- DOE will discuss what Ecological Evaluation (EE) activities can be started for OU 4. (Scott Surovchak)
- CDH will ask the CDH permit-writers to review the waste pile request for technical issues, rather than just suitability as an Interim Status change. (Harlen Ainscough)
- DOE will look at what EE field activities are ready to start. (Scott Surovchak)

The next meeting was set for June 8, 9:00 am.

5/18 Solar Ponds Meeting

Kathy London	EG&G	966-8585
Steve Keith	EG#6	966-8541
Helen Belenwan	DOE-EM 453	301 903 8549
Arturo Duran	EPA	(303) 294-1080
ERIN E OTOOLE	DOE ERO	966-2699
JOE RALU	DOE/RFO/CED	966-7410
Don FERRIER	EG&G	966-8767
Ray Boyle	"	966-6626
Don RINGLE	EG&G	966-8603
HARLEA R AINSWORTH	CDH	692-3337
Andy Ledford	EG&G	966-8673
STEVE HOWARD	DOE (SMS)	966-3040
David Maxwell	EPA	294-1082
Scott M Surouchuk	DOE/RFO	966-3557
Joe Schieffelin	CDH	692-3386 692-3386
JOE ROBERTS	EG&G	966-7000